

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

KELLY PINN, individually and on behalf of all others similarly situated,)	
)	
)	
Plaintiff,)	Civil Action No. 4:24-cv-00266-P
)	
vs.)	
)	
TRANSAMERICA LIFE INSURANCE)	
COMPANY, NATHAN JOHNSON,)	
AND BANUELOS INSURANCE)	
AGENCY LLC D/B/A LEADS GURU,)	
)	
Defendants.)	

JOINT MOTION TO EXTEND TIME TO FILE DISMISSAL PAPERS

Plaintiff Kelly Pinn and Defendants Transamerica Life Insurance Company (“Transamerica”), Nathan Johnson, and Banuelos Insurance Agency LLC (collectively, the “Parties”), hereby file this Joint Motion to Extend Time to File Dismissal Papers. In support thereof, the Parties would respectfully show the Court as follows:

1. The Parties announced that this case has been resolved. On December 6, 2024, the Court ordered the Parties to file dismissal papers on or before December 20, 2024 (ECF No. 38).
2. The Parties are in the process of executing the necessary documents and need additional time to complete performance of the agreement.
3. The Parties have been working diligently on the settlement process and respectfully ask that the Court extend the deadline to file dismissal papers by thirty (30) days from the current deadline.
4. With the requested extension, the new deadline to file dismissal papers would be January 20, 2025.

WHEREFORE, PREMISES CONSIDERED, the Parties respectfully request the Court grant this Joint Motion and order the deadline to file dismissal papers in this case be extended by thirty days.

Respectfully submitted,

/s/ Andrew Roman Perrong (signed with permission)

Andrew Roman Perrong
a@perronglaw.com
Perrong Law LLC
2657 Mount Carmel Avenue
Glenside, PA 19038
Telephone: 215.225.5529
Facsimile: 888.329.0305

/s/ Anthony Paronich (signed with permission)

Anthony Paronich
anthony@paronichlaw.com
Paronich Law, PC
350 Lincoln Street, Suite 2400
Hingham, MA 02043
Telephone: 215.225.5529
Facsimile: 888.329.0305

ATTORNEYS FOR PLAINTIFF

/s/ Bill E. Davidoff (signed with permission)

Bill E. Davidoff
State Bar No. 00790565
bill.davidoff@figdav.com
Andrew P. Speicher
State Bar No. 24027878
drew.speicher@figdav.com
Figari + Davenport LLP
901 Main Street, Suite 3400
Dallas, TX 75202
Telephone: 214.939.2000
Facsimile: 214.939.2090

ATTORNEYS FOR NATHAN JOHNSON

/s/ Cary A. Slobin

Cary S. Slobin
State Bar No. 00797445
cary.slobin@nelsonmullins.com
Nelson Mullins Riley & Scarborough LLP
5830 Granite Parkway, Suite 1000
Plano, TX 75024
Telephone: 469.484.6100
Facsimile: 469.828.7217

D. Larry Kristnik
Admitted Pro Hac Vice
larry.kristnik.nelsonmullins.com
Nelson Mullins Riley & Scarborough LLP
1320 Main Street, 17th Floor
Columbia, SC 29201
Telephone: 803.255.9531
Facsimile: 803.256.7500

ATTORNEYS FOR TRANSAMERICA LIFE INSURANCE COMPANY

/s/ Michael A. Harvey (signed with permission)

Michael A. Harvey
State Bar No. 24058352
mharvey@munsch.com
Munsch Hardt Kopf & Harr, PC
700 Milam Street, Suite 800
Houston, TX 77002
Telephone: 713.222.4015
Facsimile: 713.222.5868

ATTORNEY FOR BANUELOS INSURANCE AGENCY LLC

CERTIFICATE OF CONFERENCE

I certify that on December 19, 2024, I conferred with counsel of record for all parties via email regarding the relief requested herein and the relief requested was jointly agreed upon.

/s/ Cary A. Slobin

Cary S. Slobin

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all counsel of record in accord with the Federal Rules of Civil Procedure on this 19th day of December 2024.

/s/ Cary A. Slobin

Cary S. Slobin